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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
AIR AND RADIATION

MEMORANDUM

SUBJECT: July 25, 1990 Meeting with Chrysler Motors Concerning Ethyl Corp Waiver Application

FROM: David J. Kortum, Environmental Engineer
Field Operations and Support Division

David J. Kortum 7/31/90

TO: Docket A-90-16

On July 25, 1990, Mary Smith, Jim Caldwell, John Holley, John Garbak, and Dave Kortum, all of EPA met with Gordon Allardyce, Frank Krich, Larry Robertson, Mike Bradey, and Harry Womet of Chrysler Motors to discuss the Ethyl fuel waiver application to allow HiTEC 3000 (or MMT) up to 1/32 gram per gallon manganese in unleaded gasoline.

Mr. Allardyce presented some of Chrysler's concerns regarding data presented in the application and, in general, the use of MMT. These include: 1) Chrysler data on the analysis of Canadian catalysts indicate that plugging of catalysts may occur as a result of MMT use, especially for certain high-temperature driving cycles. 2) The increase in hydrocarbon emissions as shown by Ethyl's test program may present a problem for vehicles meeting a new more stringent hydrocarbon standard. 3) Ethyl's test program was deficient in that it included no light-duty or heavy-duty trucks, nor any heavy-load or high speed driving conditions. Further, the Ethyl data may not be reproducible and it did not adequately address future emission control systems.

A meeting agenda provided by Chrysler is attached.

Attachment

MEETING AGENDA

MMT FUEL ADDITIVE WAIVER
July 25, 1990
Chrysler at EPA, Washington, D.C.

I. Catalyst Plugging
   A. Documents
      1. SAE Papers
      2. Johnson Matthey
      3. Ethyl-Canada
   B. Catalyst Sample
   C. Photographs
      1. Chrysler's Technical Comments
      2. Additional Photographs
   D. Chrysler Analyses
      1. Deposit Fouled Catalysts

II. Hydrocarbon Emissions
   A. Documents
      1. Ethyl's Application
      2. CRC
      3. SAE Paper
      4. CARB Staff Report
   B. Standards
      1. Future 0.25 gram/mile HC
      2. Future 100,000 mile useful life: cars
      3. Current 120,000 mile useful life: light-duty trucks

III. Testing Approach
   A. Deficiencies
      1. No light-duty or heavy-duty trucks
      2. No heavy-load, high-speed driving conditions
      3. May not be reproducible
      4. Did not address future emission control systems thoroughly: close-coupled catalysts

IV. General Discussion

Certification & Regulatory Programs
FAK 07/24/90

Rep-Agenda